

ICONTROL NETWORKS, INC.

Plaintiff,

V.

ALARM.COM INCORPORATED;  
FRONTPOINT SECURITY SOLUTIONS, LLC

Defendants.

Civil Action No. 1:13-cv-834-LMB/IDD

## JURY TRIAL DEMANDED

**PLAINTIFF ICONTROL NETWORKS, INC.’S ANSWER TO  
DEFENDANT FRONTPOINT SECURITY SOLUTIONS, LLC’S COUNTERCLAIMS**

Plaintiff iControl Networks, Inc. (“iControl”) hereby answers Defendant FrontPoint Security Solutions, LLC’s (“FrontPoint”) Counterclaims (“Counterclaims”). iControl hereby responds to the numbered paragraphs of the Counterclaims and in doing so denies the allegations of the Counterclaims except as specifically stated:

## JURISDICTION AND VENUE

63. iControl admits that this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1338(a), 1367(a), 2201, and 2202, and 35 U.S.C. §§ 1, *et seq.* iControl admits that it has sued FrontPoint in this present action, alleging infringement of U.S. Patent Nos. 7,262,690; 7,911,341; 8,073,931; 8,335,842; 8,473,619 and 8,478,844.

64. iControl admits that venue is proper in this District to the extent that iControl has submitted to venue for the purposes of this action. iControl denies the remaining allegations, whether express or implied, in Paragraph 64.

**PARTIES**

65. iControl lacks knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 65 that “FrontPoint is a corporation organized and existing under the laws of the State of Delaware having its principal offices in McLean, Virginia,” and on that basis denies it.

66. iControl admits the allegations of Paragraph 66.

**FIRST COUNT**  
**DECLARATORY JUDGMENT OF NON-INFRINGEMENT**

67. Paragraphs 63-66 are reincorporated by reference as if fully set forth herein.

68. iControl admits the allegations contained in Paragraph 68.

69. iControl denies the allegations contained in Paragraph 69.

70. iControl denies the allegations contained in Paragraph 70.

**SECOND COUNT**  
**DECLARATORY JUDGMENT OF INVALIDITY**

71. Paragraphs 63-70 are reincorporated by reference as if fully set forth herein.

72. iControl admits the allegations contained in Paragraph 72.

73. iControl denies the allegations contained in Paragraph 73.

**AFFIRMATIVE DEFENSES**

74. FrontPoint’s counterclaims fail to state a claim upon which relief can be granted.

**PRAYER FOR RELIEF**

iControl denies that FrontPoint is entitled to any of the relief requested in paragraphs A through E of its prayer for relief or to any other relief in any form whatsoever. iControl further denies each and every allegation contained in the Counterclaims to which it has not specifically responded.

**JURY DEMAND**

iControl admits that FrontPoint demands a trial by jury on all issues and claims so triable and requests a jury trial on all issues so triable under Frontpoint's counterclaims as well.

Dated: November 25, 2013

Respectfully submitted,

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*Counsel for Plaintiff iControl Networks, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 25, 2013, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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